

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

DEQUAN LOVALOY,)	
)	
Plaintiff,)	
)	
v.)	No. 24 CV 864
)	
CITY OF CHICAGO, THOMAS BISHOP,)	
#17301, and BRYAN MORDAN, #11437,)	
)	
Defendants.)	

COMPLAINT

NOW COMES the Plaintiff, DEQUAN LOVALOY, by and through his counsel, SAMUELS & ASSOCIATES, LTD., and complaining of the defendants, CITY OF CHICAGO, THOMAS BISHOP, #17301, and BRYAN MORDAN, #11437, states as follows:

INTRODUCTION

This is a civil action seeking damages against defendants for committing acts under color of law, and depriving Plaintiff of rights secured by the Constitution and laws of the United States.

JURISDICTION

1. This action is brought pursuant to the Civil Rights Act, 42 U.S.C. § 1983, and the Fourth and Fourteenth Amendments to the United States Constitution.
2. The jurisdiction of this Court is invoked pursuant to the judicial code 28 U.S.C. § 1331 and 1343 (a); the Constitution of the United States.
3. Pendent jurisdiction as provided under 28 U.S.C. § 1367(a).

PARTIES

4. Plaintiff DEQUAN LOVALOY is a citizen of the United States of America, who, at all times relevant, resided in Cook County, Illinois.
5. Defendants THOMAS BISHOP, #17301, and BRYAN MORDAN, #11437, (“Defendant Officers”) were, at the time of this occurrence, duly licensed Chicago Police Officers. They engaged in the conduct complained of in the course and scope of their employment and under color of law. They are sued in their individual capacities.
6. Defendant CITY OF CHICAGO (“City”) is a municipal corporation duly incorporated under the laws of the State of Illinois, and is the employer and principal of Defendant Officer.

FACTS

7. On or around 15 July 2022, Plaintiff Dequan Loyaloy was driving in a vehicle with his friend when they were pulled over by Defendant Officers.
8. There was no reasonable and articulable suspicion for the seizure of Plaintiff.
9. Plaintiff was immediately ordered out of the car, handcuffed, and put into the back of a police vehicle.
10. Defendant Officers then unlawfully searched the car.
11. Plaintiff and his friend were taken back to the police station.
12. While there, Defendant Officers used excessive force on Plaintiff’s friend.

13. To cover up for their misconduct, they released the friend so long as he promised not to file a complaint against them, and then told Plaintiff now he would have to “take one for the team.”
14. Without probable cause, Plaintiff was charged with manufacturing/ delivering illegal narcotics.
15. Plaintiff was detained in jail before finally posting bond thanks to the help of his mentor.
16. On 5 August 2022, all the charges against Plaintiff were dismissed in a manner consistent with his innocence.
17. The acts of Defendant Officer were intentional, willful and wanton.
18. As a direct and proximate result of the unlawful actions of the defendants, Plaintiff was injured, including physical injuries, pain and suffering, humiliation, embarrassment, fear, emotional trauma, mental anguish, the deprivation of their constitutional rights and dignity, interference with a normal life, lost time, and attorneys’ fees.

COUNT I: 42 U.S.C. § 1983 - Fourth and Fourteenth Amendment

19. Plaintiff re-alleges the above paragraphs as though fully set forth herein.
20. The search, seizure, and detainment of Plaintiff’s person and property performed willfully and wantonly by Defendant Officers based upon false and fabricated evidence, as detailed above, were in violation of Plaintiff’s rights under the Fourth and Fourteenth Amendment to the Constitution of the United States and 42 U.S.C. §1983.

21. As a direct and proximate result of the above-detailed actions of the defendants, Plaintiff was injured.

WHEREFORE the Plaintiff, DEQUAN LOVALOY, pursuant to 42 U.S.C. §1983, demands judgment against Defendant Officers for compensatory damages, punitive damages, the costs of this action and attorneys' fees, and any such other and further relief as this Court deems equitable and just.

PLAINTIFF DEMANDS TRIAL BY JURY.

Respectfully Submitted,

DEQUAN LOVALOY

By: s/ Jeanette Samuels
One of Plaintiff's Attorneys

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